

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING
(PROPOSAL SIX)

Docket No. RM2020-13

MOTION OF THE UNITED STATES POSTAL SERVICE FOR AN
EXTENSION OF TIME TO RESPOND TO CHAIRMAN'S
INFORMATION REQUEST NO. 5
(December 11, 2020)

Chairman's Information Request No. 5 in this docket was issued on December 10, 2020, with a response deadline of December 18, 2020. The Postal Service hereby seeks a three-week extension of the response deadline to January 8, 2021.

ChIR 5 consists of nine questions covering nine pages. Responses to some of the questions will require consultation with experts on financial/operations data systems, and the availability of such experts can be challenging this time of the year. Much more critically, however, the individuals with primary responsibility for Proposal Six also have major responsibilities with respect to ACR preparation. Efforts to fulfill some of those ACR responsibilities have already been delayed because of the need to prepare the Reply Comments filed in this docket earlier this week. The ACR faces a statutory deadline of December 29, and ACR preparation requires a series of sequential hand-offs, with potentially dire consequences if any hand-off in the series is delayed. Both the coming week and the week beyond are vitally critical to ACR work. Since ACR preparation thus must take priority, it is not practical for the Postal Service to presume that it will be able to file timely responses to the ChIR under the current deadline.

To relieve the pressure of potentially conflicting obligations, the Postal Service requests that the deadline for the response to ChIR No. 5 be extended until January 8, or about a week after the ACR is due. While this would represent an extension of three weeks, the existence of the two official holidays during that period hardly begins to reflect the myriad obstacles that arise for completion of tasks that must be undertaken over that period of the calendar. Moreover, the Postal Service is optimistic that the entire period up until January 8 may not be necessary, and the Postal Service commits to providing the responses as soon as possible. Setting a conservative schedule now, however, should minimize the risks of any further motion practice regarding these responses, while allowing more time if necessary for full and careful consideration of the questions. Furthermore, since the comment phase has already occurred, even if the delay were to extend as long as the full three weeks, it seems doubtful that prejudice would accrue to any participant.

Wherefore, the Postal Service respectfully requests that the response deadline for ChIR No. 5 be extended to Friday, January 8, 2021.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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